

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SPECTRUM	§	
LABORATORIES, LLC.,	§	
an Ohio Limited Liability	§	CIVIL ACTION No.
Company,	§	<u>4:22-CV-03705</u>
Plaintiff,	§	
	§	
	§	
vs.	§	JUDGE CHARLES ESKRIDGE
	§	
	§	
DOES #1-10,	§	
Defendants.	§	

SPECTRUM’S PROPOSED ORDER GRANTING
SPECTRUM’S MOTION FOR SANCTIONS

In accordance with the Court’s February 13, 2024 Order (Dkt. 97), Plaintiff Spectrum Laboratories, LLC provides the attached proposed order, **Exhibit 1**, substantially in the form previously submitted by Spectrum Laboratories as Dkt 83-6 at 13, points 1-4, 7. As ordered by the Court, Spectrum has noted disagreements by URZ. Spectrum asked URZ to provide written redlines or comments to Spectrum’s proposed order before they conferred by phone. URZ refused, would only dictate its disagreements orally over the phone on February 27, and demanded that Spectrum type out URZ’s disagreements itself in this filing, which Spectrum has done.

DATED: February 28, 2024

Respectfully submitted,

By: /s/ Matthew J. Cavanagh

David B. Cupar (*pro hac vice*)

Attorney in Charge

Ohio Bar No. 71622

dcupar@mcdonaldhopkins.com

Matthew J. Cavanagh (*pro hac vice*)

Ohio Bar No. 79522

mcavanagh@mcdonaldhopkins.com

MCDONALD HOPKINS LLC

600 Superior Avenue, East

Suite 2100

Cleveland, Ohio 44114

Telephone: 216.348.5400

Facsimile: 216.348.5474

By: /s/ Courtney Ervin

Courtney Ervin

Texas Bar No. 24050571

SDTX No. 611093

cervin@hicks-thomas.com

D. Ryan Cordell, Jr.

State Bar No. 24109754

Fed. I.D. No. 3455818

rcordell@hicks-thomas.com

HICKS THOMAS LLP

700 Louisiana St., Suite 2000

Houston, Texas 77002

Telephone: 713.547.9100

Facsimile: 713.547.9150

**ATTORNEYS FOR PLAINTIFF
SPECTRUM LABORATORIES, LLC**

CERTIFICATE OF SERVICE

Service of this document on counsel of record was accomplished automatically through the Court's Notice of Electronic Filing on February 28, 2024.

/s/ Courtney Ervin
Courtney Ervin